## LAW OFFICES OF KENNETH J. KAPLAN, P.C.

260 Madison Avenue New York, NY 10016 Tel: (212)750-3100 Fax: (212)750-8628 Email: Kjkaplan@kjkaplanlaw.com Web: www.kjkaplanlaw.com

March 31, 2021

1

BY ECF

Honorable Arlene R. Lindsay United States Magistrate Judge For the Eastern District of New York 100 Federal Plaza Central Islip, NY 11722

> Re: United States v. Frances Cabasso et al. 19-CR-582 (DRH)(ARL—Travel Request

Dear Judge Lindsay,

On behalf of Defendant Frances Cabasso, I respectfully request that Ms. Cabasso be granted permission to travel as follows: on May 15-16, 2021 to Jersey City, NJ for a wedding; on May 16, 2021 to Danbury, CT for a bridal shower; and on June 12, 2021 to Millbrook, NY for another wedding. Ms. Cabasso was released on bail with conditions, including travel restrictions.

AUSA Kayla Bensing and Pre-Trial Services Officer Donna Mackey do not have any objection to this travel request. Accordingly, I respectfully request that the Court grant Ms. Cabasso's travel request and thank the Court for considering this application.

Respectfully submitted,

Kenneth J. Kaplan

cc: AUSA, Kayla Bensing (By ECF) PTS Officer Donna Mackey (By email)

Dated: 4/22/2021

So Ordered: